

Remarks

Claims 1-20 are pending.

Claims 1-20 were rejected under Section 102 as being anticipated by Petchenkine (6624908). The remarks made in support of the rejection are quoted below in full.

"Note 'interface module' (see lines 47-55 of column 21), 'printer driver' (see lines 37-44 of column 18) and 'add-on module' (10-17 of column 3) as claimed by the applicant and taught by Petchenkine et al." Office Action, page 2.

The Office carries the initial burden of establishing a *prima facie* case of anticipation. To meet this burden, the Office must show that the reference teaches "each and every element as set forth in the claim." MPEP § 2131 (quoting *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987)). It is not enough that the reference discloses all the claim elements in isolation. Rather, "anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, *arranged as in the claim*." See, e.g., *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 1456 (Fed. Cir. 1984) (emphasis added). The Office has made no showing whatsoever that Petchenkine discloses an interface module, a printer driver and an add-on module arranged as recited in the claims. Applicants respectfully submit that the Office's conclusory statement "as claimed by the applicant" following a listing of the claim elements in isolation is wholly insufficient to meet this burden. The Office has, therefore, failed to establish a *prima facie* case of anticipation as to any of the claims. For this reason alone, the rejections should be withdrawn.

Independent Claims 1 and 16. Claim 1 recites "providing an interface module that interfaces with the printer driver." Petchenkine's "Open Prepress Interface (OPI) module 336" disclosed at column 21, line 48 has no apparent relationship to the printer driver mentioned at column 18, line 40. That is to say, Open Prepress Interface module 336 does not interface with the printer driver as recited in Claim 1, at least not as far as Applicants have been able to determine from Petchenkine's disclosure. Hence, even if it is assumed that Open Prepress Interface module 336 in Petchenkine is an interface

module as recited in Claim 1, Petechkine still does not disclose the claimed interface between the interface module and the printer driver.

Claim 1 also recites "registering a add-on module with said interface module." Petchenkine's Open Prepress Interface module 336 has no apparent relationship to the add-on modules mentioned at column 3, lines 13-14. That is to say, the add-on modules are not registered with Open Prepress Interface module 336 as recited in Claim 1, at least not as far as Applicants have been able to determine from Petchenkine's disclosure. Hence, even if it is assumed that Open Prepress Interface module 336 in Petchenkine is an interface module as recited in Claim 1, Petechkine still does not disclose registering an add-on module with the interface module as claimed.

A similar analysis applies to Claim 16 which is a programming counterpart to Claim 1.

If the Office disagrees with the Applicants' analysis, it is respectfully requested to specifically point out and explain those passages in Petchenkine that show the claimed relationship between an interface module, the printer driver and an add-on module. Absent such a showing, the rejections should be withdrawn.

Dependent Claims 2-15 and 17-20. The Office does not specifically address any of the limitations added in the dependent claims. In view of the fact that the Office has failed to carry its burden of establishing a *prima facie* case of anticipation, the Applicants have not studied all aspects of Petchenkine's disclosure. Nevertheless, it does not appear that Petchenkine teaches the following additional dependent claim limitations.

Receiving property information at the interface module from an add-on module (Claim 2).

Registering an add-on module with the interface module independent from the printer driver (Claim 3).

Receiving a call from the printer driver indicating that a print job is initiated; determining whether any of the add-on modules are responsive to the call; and in response to determining that an add-on module is responsive, sequentially connecting a responsive add-on module to the printer driver via the interface module (method Claim 4 and programming counterpart Claim 17).

Receiving a call from the printer driver indicating that an access point has been reached; determining whether any of the add-on modules are responsive to the call; and in response to determining that an add-on module is responsive, sequentially connecting a responsive add-on module to the printer driver via the interface module (method Claim 6 and programming counterpart Claim 18).

A responsive add-on module inserts data into the print stream at the access point (Claim 7 depending from Claim 6); a responsive add-on module inserts a command into the print stream at the access point (Claim 8 depending from Claim 6); a responsive add-on module transmits a command to the printer driver (Claim 9 depending from Claim 6); an access point is selected from the group consisting of a document start, a document end, a physical page start, a physical page end, a logical page start, and a logical page end (Claim 10 depending from Claim 6); an access point is dynamically selectable (Claim 11 depending from Claim 6).

Querying the printer driver from an add-on module about a the setting and receiving information from the printer driver in response to the querying (method Claim 12 and programming counterpart Claim 19).

Changing a printer driver setting through the interface module under the control of an add-on module (method Claim 14 and programming counterpart Claim 20).

Providing an additional printer driver and a corresponding additional interface module for each additional printer driver and an add-on module is registered with a plurality of the interface modules (Claim 15).

Again, if the Office disagrees with the Applicants' analysis, it is respectfully requested to specifically point out and explain those passages in Petchenkine that show the additional limitations recited in the dependent claims.

The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,

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